

Desert View Power, Inc. an affiliate of



January 19, 2022

DVP-220007

Scott Connolly,

EPA Region IX (Attn. Air Section, ENF-2-1)

75 Hawthorne Street  
San Francisco, CA 94105

Subject: Desert View Power, Annual Compliance Certification for Period January 01, 2021, to December 31, 2021.

Scott Connolly,

In compliance with our permit, Permit No. CB-ROP 05-01, enclosed is the Annual Compliance Certification for January 01, 2021, to December 31, 2021, for Desert View Power.

Enclosed are the following:

- Form Certification of Truth, Accuracy, and Completeness (CTAC)
- Annual Compliance Certification for January 01, 2021, to December 31, 2021.

If you have questions or comments, please feel free to call me at (760) 262-1644.

Sincerely,

A handwritten signature in black ink that reads "Kevin Lawrence". The signature is written in a cursive, flowing style.

Kevin Lawrence  
Plant Manager  
Desert View Power  
62-300 Gene Welmas Drive  
Mecca, CA 92554

Desert View Power, Inc. an affiliate of



Enclosure

cc: Chief, Industrial Strategies Division

California Air Resources Board

P.O. Box 2815

Sacramento, CA 95814

Air Pollution Control Officer

Attention: Mr. Jack Cheng, AQAC Supervisor

South Coast Air Quality Management District

21865 E. Copley Drive

Diamond Bar, CA 91765-4182

Federal Operating Permit Program (40 CFR Part 71)  
**CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)**

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

**A. Responsible Official**

Name: (Last) Cook (First) Greg (MI) \_\_\_\_\_

Title CEO

Street or P.O. Box 62-300 Gene Welmas Drive

City Mecca State CA ZIP 92254

Telephone ( 760 ) 262 - 1644 Ext. \_\_\_\_\_ Facsimile ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

**B. Certification of Truth, Accuracy and Completeness** (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) \_\_\_\_\_  \_\_\_\_\_

Name (typed) Greg Cook Date: 1 / 19 / 2022

Federal Operating Permit Program (40 CFR Part 71)  
**ANNUAL COMPLIANCE CERTIFICATION (A-COMP)**

**A. GENERAL INFORMATION**

Permit No. CB-ROP 05-01

Reporting Period: Beg. 01/01/2021 End 12/31/2021

Source / Company Name Desert View Power

Mailing Address: Street or P.O. Box 62-300 Gene Welmas Drive

City Mecca State CA ZIP 92254

Contact person Kevin Lawrence Title Plant Manager

Telephone (760) 262 – 1644 Ext. \_\_\_\_\_

Continued on next page

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge into the atmosphere SO<sub>2</sub> in excess of the more stringent of 12.0 lbs/hr per boiler or 27 ppm, dry, corrected to 3% O<sub>2</sub> (3-hour average). Shall not discharge into the atmosphere SO<sub>2</sub> in excess of a rolling average of 70 tons/year calculated daily", Permit Condition II.A.1.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of SO<sub>2</sub> emissions updating every 10 seconds and providing one hour averages, three hour averages and tons per year totals.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When fired on petroleum coke, shall not discharge SO<sub>2</sub> in excess of 10 percent (0.10) of the potential SO<sub>2</sub> emission rate (90 percent reduction) and 520 ng/J (or 1.2 lb/MMBtu) on a 30-day rolling average basis", Permit Condition II.A.2 Through 3.**

Compliance Methods for the Above (Description and Citation): **Petroleum coke was not used at the site in Calendar Year (CY) 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge PM<sub>10</sub> in excess of the more stringent of 0.006 gr/dscf at 12% O<sub>2</sub> or 3.9 lbs/hr per boiler (3-hour average)", Permit Condition II.A.4.**

Compliance Methods for the Above (Description and Citation): **PM<sub>10</sub> discharge was measured during 2021 annual emissions performance testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When fired on petroleum coke (alone or with other fuels) or wood (alone or with other fuels), shall not discharge into the atmosphere particulate matter (PM) in excess of 43 ng/J (or 0.10 lb/MMBtu) heat input", Permit Condition II.A.5**

Compliance Methods for the Above (Description and Citation): **PM discharge was measured during 2021 annual emissions performance testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge into the atmosphere filterable PM in excess of 0.11 lb/MMBtu of heat input", Permit Condition II.A.6.**

Compliance Methods for the Above (Description and Citation): **Filterable PM discharge was measured during 2021 annual emissions performance testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge into the atmosphere exhaust stack gases which exhibit an opacity of 10 percent or greater for any period or periods aggregating more than three minutes in any one hour", Permit Condition II.A.7.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of opacity emissions updating instantaneously, ten seconds, three minutes, and hourly averages.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain opacity to less than or equal to 10 percent opacity or the highest hourly average (daily block average) opacity reading measured during the performance test run", Permit Condition II.A.8.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of opacity emissions updating instantaneously, ten seconds, three minutes, and hourly averages.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When fired on petroleum coke, shall not discharge into the atmosphere any gases that exhibit greater than 20 percent opacity (6- minute average), except for one 6-minute period per hour of not more than 27 percent opacity", Permit Condition II.A.9.**

Compliance Methods for the Above (Description and Citation): **Petroleum coke was not used at the site in Calendar Year (CY) 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge CO into the atmosphere in excess of the more stringent of 13.0 lbs/hr per boiler or 231 ppm, dry, corrected to 3% O2 (3-hour average)", Permit Condition II.A.10.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of CO emissions updating every ten seconds and providing one hour and three hour averages.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge CO in excess of 310 ppm by volume on a dry basis corrected to 3 percent oxygen, 30-day rolling average", Permit Condition II.A.11.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of CO emissions updating every ten seconds and providing 30-day rolling average emissions data.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge into the atmosphere NO<sub>x</sub> in excess of the more stringent of 30.0 lbs/hr per boiler or 94 ppm, dry, corrected to 3% O<sub>2</sub> (3-hour average)". "Shall not discharge NO<sub>x</sub> in excess of 648 lbs/day per boiler for any calendar day", Permit Condition II.A.12.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of NO<sub>x</sub> emissions updating every ten seconds and providing one hour averages, three hour averages, and daily totals.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge into the atmosphere NO<sub>x</sub> in excess of the following limits on a 30-day rolling average basis when firing these fuels", Permit Condition, II.A.13 and 14.**

- **Natural gas only - 43 ng/J (or 0.10 lb/MMBtu) heat input**
- **Petroleum coke only - 260 ng/J (or 0.60 lb/MMBtu) heat input**
- **Petroleum coke and other fuel(s) – Per formula  $E_n = [(EL_g \times H_g) + (EL_c \times H_c)] / (H_g + H_c)$**
- **Wood and natural gas - 130 ng/J (0.30 lb/MMBtu) heat input**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of NO<sub>x</sub> emissions updating every ten seconds and providing 30-day rolling average emissions data. Petroleum coke was not used at the site in Calendar Year (CY) 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge hydrocarbons in excess of 5.9 lbs/hr per boiler (3-hour average)", Permit Condition, II.A.15.**

Compliance Methods for the Above (Description and Citation): **Hydrocarbon discharge was measured during 2021 annual emissions performance testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge hydrogen chloride in excess of 0.022 lb per MMBtu of heat input", Permit Condition, II.A.16.**

Compliance Methods for the Above (Description and Citation): **Hydrogen chloride discharge was measured during 2021 annual emissions performance testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not discharge mercury in excess of 5.7E-06 lb per MMBtu of heat input", Permit Condition, II.A.17.**

Compliance Methods for the Above (Description and Citation): **Failed mercury stack test that was conducted in March 2021. Stack test was reconducted in December 2021, and it met mercury emission limit of 5.7E-06 lb per MMBtu of heat input.**

Status (Check one): ☒ **X** ☐ Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The emission limits and percent reduction requirements in Conditions II.A.2 and II.A.13 apply at all times including periods of startup, shutdown and malfunction", Permit Condition, II.A.18.b.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of each type of emission depending on the permit requirements.**

Status (Check one): ☐ Intermittent Compliance ☒ **X** ☐ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"During startup, Operating temperature indicating steady state load shall be indicated by the temperature at the outlet of the recycle cyclone reaching 1550 degrees Fahrenheit for a period of at least 5 minutes", Permit Condition, II.A.18.d.**

Compliance Methods for the Above (Description and Citation): **The plant is in start up until this is achieved.**

Status (Check one): ☐ Intermittent Compliance ☒ **X** ☐ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"During startup, must operate all continuous monitoring systems", Permit Condition II.A.18.f.i.1.**

Compliance Methods for the Above (Description and Citation): **CEMS was in operation during all the startup activities in CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For startup, must use one or a combination of clean fuels vent emissions to the main stack and operate all applicable control devices, except the fabric filter/baghouse, and the dry sorbent and limestone injection system", must start the dry sorbent and limestone injection system as expeditiously as possible", Permit Condition II.A.18.f.i.2.**

Compliance Methods for the Above (Description and Citation): **For startup, clean fuels are used, and emissions are vented the main stack. Hydrated lime/dry sorbent injection system is started as expeditiously as possible.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For startup, after firing of fuels other than clean fuels, vent emissions to the main stack(s) and engage all of the applicable control devices so as to meet with the emission limits within 4 hours of start of supplying useful thermal energy", Permit Condition II.A.18.f.i.3.**

Compliance Methods for the Above (Description and Citation): **For startup, after firing of fuels other than clean fuels, emissions are vented to the main stack and all of the applicable control devices are engaged within 4 hours of start of supplying useful thermal energy.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"During shutdown, must operate all continuous monitoring systems", Permit Condition II.A.18.f.ii.1.**

Compliance Methods for the Above (Description and Citation): **CEMS was in operation during the shutdown activities in CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For shutdown, when firing fuels other than clean fuels, vent emissions to the main stack and operate all applicable control devices, except the fabric filter/baghouse, and the dry sorbent and limestone injection system, unless it is necessary to comply with other applicable requirements that require operation of the control device", Permit Condition II.A.18.f.ii.2.**

Compliance Methods for the Above (Description and Citation): **For shutdown, when firing fuels other than clean fuels, emissions are vented to the main stack.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For shutdown, if in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of clean fuels", Permit Condition II.A.18.f.ii.3.**

Compliance Methods for the Above (Description and Citation): **No additional fuel is required during shut down.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For startup and shutdown, collect monitoring data per 40 CFR 63.7535(b), keep records, provide reports concerning activities and periods of startup and shutdown, as specified in 40 CFR 63.7555", Permit Condition II.A.18.f.iii**

Compliance Methods for the Above (Description and Citation): **Monitoring data for startup and shutdown activities is recorded and available for review at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each boiler will exhaust to a fabric filter, using PTFE or teflon-laminated bags, for the control of particulate emissions", Permit Condition II.B.1.a.**

Compliance Methods for the Above (Description and Citation): **Each boiler exhaust to a fabric filter, using PTFE or teflon-laminated bags, for the control of particulate emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each boiler shall be equipped with a limestone injection and hydrated lime system for the control of SO<sub>2</sub>, acid gas emissions (H<sub>2</sub>SO<sub>4</sub> and HCl)", Permit Condition II.B.1.b.**

Compliance Methods for the Above (Description and Citation): **Each boiler is equipped with a limestone injection and hydrated lime system for the control of SO<sub>2</sub>, acid gas emissions (H<sub>2</sub>SO<sub>4</sub> and HCl).**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each boiler shall be equipped with an ammonia injection system for the control of NOx emissions", Permit Condition II.B.1.c**

Compliance Methods for the Above (Description and Citation): **Each boiler is equipped with an ammonia injection system for the control of NOx emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-04**

Permit Term (Describe requirements and cross-reference): **"The onsite fuel hog shall be wind enclosed for the control of particulate emissions", Permit Condition II.B.1.d.**

Compliance Methods for the Above (Description and Citation): **The onsite fuel hog is wind enclosed for the control of particulate emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"The ash handling system shall be completely enclosed, and the ash storage silo equipped with a fabric filter, for the control of particulate emissions", Permit Condition II.B.1.e.**

Compliance Methods for the Above (Description and Citation): **The ash handling system is completely enclosed, and the ash storage silo is equipped with a fabric filter.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-08**

Permit Term (Describe requirements and cross-reference): **"Shall have drift controls installed to limit drift losses to 0.001 percent of the circulating water mass for the control of particulate emissions", Permit Condition II.B.1.f.**

Compliance Methods for the Above (Description and Citation): **Cooling tower is equipped with drift controls to control particulate emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-06**

Permit Term (Describe requirements and cross-reference): **"Shall have an enclosed petroleum coke storage facility; no open storage of petroleum coke shall be allowed", Permit Condition II.B.1.g.**

Compliance Methods for the Above (Description and Citation): **Petroleum coke storage facility is an enclosed facility. No petroleum coke was received at the site in CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Only natural gas, propane, or other such gas may be fired by the auxiliary burners", Permit Condition II.B.2.**

Compliance Methods for the Above (Description and Citation): **Only natural gas, propane, or other such gas are fired by the auxiliary burners.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Treated wood or wood wastes, coal or coal byproducts and municipal solid waste other than wood waste, railroad ties, tire-derived fuel (TDF), and corrugated paper waste, shall not be used as a fuel", Permit Condition II.B.3.**

Compliance Methods for the Above (Description and Citation): **Record of fuel usage is maintained at the facility. Treated wood or wood wastes, coal or coal byproducts and municipal solid waste (except wood waste, railroad ties, tire-derived fuel (TDF), and corrugated paper waste) are not used as fuel at the facility.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-03 and EU-07**

Permit Term (Describe requirements and cross-reference): **"When wind speeds exceed 12 mph, shall control particulate emissions from the fuel storage pile and from the ash storage pile through the use of regular watering", Permit Condition II.B.4.**

Compliance Methods for the Above (Description and Citation): **Regular watering is performed at the facility to control particulate emissions from the fuel storage pile and from the ash storage pile.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"Operation of the emergency generator (EU-09) and fire pump (EU-10) shall not exceed 200 hours per calendar year each nor use more than 22 gallons of diesel per hour per unit", Permit Condition II.B.5.a.**

Compliance Methods for the Above (Description and Citation): **Emergency generator (EU-09) and fire pump (EU-10) run hours record is maintained at the facility.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"For the engine to be considered an emergency engine", operate EU-09 and EU-10 for any combination of the purposes specified in 40 CFR 63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year each", Permit Condition II.B.5.b (i)**

Compliance Methods for the Above (Description and Citation): **EU-09 and EU-10 run hours record is maintained at the site. In CY 2021, EU-09 and EU-10 were operated only for testing purpose not exceeding 100 hours.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"May be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours allowed by Condition No. II.B.5.b.i. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity", Permit Condition II.B.5.b (ii).**

Compliance Methods for the Above (Description and Citation): **EU-09 and EU-10 run hours record is maintained at the site. In CY 2021, EU-09 and EU-10 were operated only for testing purpose not exceeding 100 hours.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"Change oil and filter every 500 hours of operation or annually, whichever comes first, Permit Condition II.B.5.c.**

Compliance Methods for the Above (Description and Citation): **Tracked in the Tabware CMMS.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary", Permit Condition II.B.5.d.**

Compliance Methods for the Above (Description and Citation): **Tracked in the Tabware CMMS.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary", Permit Condition II.B.5.e.**

Compliance Methods for the Above (Description and Citation): **Tracked in the Tabware CMMS.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply", Permit Condition II.B.5.f.**

Compliance Methods for the Above (Description and Citation): **Units are operated per NFPA standards.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"Operate and maintain each engine according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow your own maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions", Permit Condition II.B.5.g.**

Compliance Methods for the Above (Description and Citation): **EU-09 and EU-10 are operated as per manufacturer's emission-related operation and maintenance instructions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09 and EU-10**

Permit Term (Describe requirements and cross-reference): **"For the engine to be considered an emergency engine, operate the engine according to 40 CFR 63.6640(f)(1-3)", Permit Condition II.B.5.h.**

Compliance Methods for the Above (Description and Citation): **EU-09 and EU-10 run hours record is maintained at the site. In CY 2021, EU-09 and EU-10 were operated only for testing purpose not exceeding 100 hours.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"Shall comply at all times with the requirements of South Coast Air Quality Management District (SCAQMD) Rule 403 - Fugitive Dust", Permit Condition II.B.7.**

Compliance Methods for the Above (Description and Citation): **Operators document malfunctions in daily logs.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"The total amount of ash stored at any one time shall not exceed 13,500 tons", Permit Condition II.B.7.a.**

Compliance Methods for the Above (Description and Citation): **Ash storage record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"Prior to transfer from the silo to the storage area, ash shall be conditioned with water to prevent dust generation during filling of the transfer truck, movement to the storage area, and placement in storage", Permit Condition II.B.7.b.**

Compliance Methods for the Above (Description and Citation): **Ash is conditioned with water to prevent dust generation during filling of the transfer truck, movement to the storage area, and placement in storage.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"The ash storage pile shall not exceed 15 feet in height", Permit Condition II.B.7.c.**

Compliance Methods for the Above (Description and Citation): **Ash storage pile height record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"During reclamation from storage for transport, offsite or otherwise, any disturbed ash shall be sprayed with water to prevent dust generation", Permit Condition II.B.7.d.**

Compliance Methods for the Above (Description and Citation): **Ash is sprayed with water prior to offsite transfer to prevent dust generation.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-07**

Permit Term (Describe requirements and cross-reference): **"Prior to movement offsite, transfer trucks shall be water washed, if necessary, to remove loose ash. Exposed ash on any ash transfer truck shall be either wetted or fully covered with a tarp to prevent dust generation during transport", Permit Condition II.B.7.e.**

Compliance Methods for the Above (Description and Citation): **Prior to offsite transfer, trucks are water washed. Exposed ash on the truck is either wetted or fully covered to prevent dust generation.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall utilize quarterly a minimum of fifty percent (50%) biomass materials (by weight) as feedstock in solids fuel supply for the Facility", Permit Condition II.B.8.**

Compliance Methods for the Above (Description and Citation): **Biomass materials usage record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall utilize fuel mix rates which allow the plant to continually meet all applicable EPA and SCAQMD emission standards", Permit Condition II.B.8.**

Compliance Methods for the Above (Description and Citation): **CEMS**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall utilize in any two-consecutive calendar-year periods a minimum annual average of 60,000 bone-dry tons of a combination of agricultural crop residue waste and woody waste generated from sources in Riverside County located within the Coachella Valley", Permit Condition II.B.9.**

Compliance Methods for the Above (Description and Citation): **Utilization record of agricultural crop residue waste and woody waste generated from sources in Riverside County located within the Coachella Valley is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"May combust natural gas to satisfy the SO<sub>2</sub> emission limit in Condition II.A.3 of the Title V permit when the SO<sub>2</sub> control system is not being operated because of malfunction or maintenance of the SO<sub>2</sub> control system", Permit Condition II.B.10.**

Compliance Methods for the Above (Description and Citation): **SO<sub>2</sub> emissions in compliance.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not utilize on an hourly basis more than twenty percent (20%) each railroad ties, TDF, and corrugated paper waste calculated on an energy basis", Permit Condition II.B.11.**

Compliance Methods for the Above (Description and Citation): **Fuel utilization record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not utilize on an annual basis more than 15% each railroad ties, TDF, and corrugated paper waste calculated on an energy basis", Permit Condition II.B.11.**

Compliance Methods for the Above (Description and Citation): **Fuel utilization record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Must have a one-time energy assessment performed by a qualified energy assessor pursuant to the requirements of 40 CFR Part 63, Subpart DDDDD, Table 3", Permit Condition II.B.12.**

Compliance Methods for the Above (Description and Citation): **Prior Assessment**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Must conduct a tune-up of the boilers every five years pursuant to the requirements of 40 CFR Part 63, Subpart DDDDD, Table 3", Permit Condition II.B.13.**

Compliance Methods for the Above (Description and Citation): **Tune-up of the boilers is being conducted every five years. Most recent tune-up of the boilers was conducted on March 23, 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Establish a minimum dry sorbent injection rate as defined in 40 CFR 63.7575 and develop an operating limit pursuant to Table 7, Item 2b requirements. The monitoring system for the dry sorbent injection rate must meet the requirements in 40 CFR 63.7525(i)(1) and (2). [40 CFR 63.7525(i)]", Permit Condition II.B.14.**

Compliance Methods for the Above (Description and Citation): **Stack testing establishes annual SO<sub>2</sub> compliance limit.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"In the alternative, may establish an alternative site-specific maximum SO<sub>2</sub> emission rate according to §63.7530(b) and operate an SO<sub>2</sub> CEMS pursuant to 40 CFR 63.7525(m)", Permit Condition II.B.14.a.**

Compliance Methods for the Above (Description and Citation): **Stack testing establishes annual SO<sub>2</sub> compliance limit.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"In the alternative, may install, operate and maintain an HCl CEMS pursuant to 40 CFR 63.7540(a)(15)", Permit Condition II.B.14.b.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>SO<sub>2</sub> CEMS is used to monitor HCl emissions of the boiler stack.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>N/A</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"Comply with applicable requirements for preconstruction review pursuant to 40 CFR part 49.151-167 for any new equipment installation", Permit Condition II.B.14.c.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Facility complies with preconstruction review requirements as applicable. No new equipment was installed at the site in CY 2021.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"To comply with emission and operating requirements for mercury, either install, operate and maintain a Mercury CEMS according to 40 CFR 63.7540(a)(14); or in the alternative, may establish and maintain a minimum carbon injection rate as defined in 40 CFR 63.7575 and develop an operating limit pursuant to Table 7, Item 3 requirements", Permit Condition II.B.15 and II.B.15.a.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Compliance demonstrated through stack testing.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Comply with the fuel analysis requirements for emissions of HCl and Mercury pursuant to 40 CFR Part 63, Subpart DDDDD, Table 6 if not operating a Mercury CEMS for compliance with Mercury limits or an HCl or SO<sub>2</sub> CEMS for compliance with HCl limits", Permit Condition II.B.16.**

Compliance Methods for the Above (Description and Citation): **Compliance demonstrated through stack testing.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-13**

Permit Term (Describe requirements and cross-reference): **"Vehicle miles traveled (VMT) for truck traffic associated with deliveries of hydrated lime to the permitted source shall not exceed 280 miles per 12-month period", Permit Condition II.B.17.a.i.**

Compliance Methods for the Above (Description and Citation): **Vehicle miles traveled (VMT) for truck traffic associated with deliveries of hydrated lime is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-11**

Permit Term (Describe requirements and cross-reference): **"Annual delivery and usage of hydrated lime shall not exceed 2365 tons per 12-month period", Permit Condition II.B.17.a.ii.**

Compliance Methods for the Above (Description and Citation): **Annual delivery and usage record of hydrated lime is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

<p>Emission Unit ID(s): <b>EU-11 and EU-13</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"Monitor on a monthly basis each delivery of hydrated lime (in tons) and the VMT for each delivery", Permit Condition II.B.17.b.i.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Record of delivery of hydrated lime (in tons) and the VMT for each delivery is maintained at the site.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-11</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"At least once per calendar month, inspect the interior and exterior of the fabric filters for evidence of damage or leaks and take appropriate corrective actions to restore filters to proper operation before resuming normal operations", Permit Condition II.B.17.b.ii.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Record of hydrated lime fabric filters inspection is maintained at the site. Upon evidence of damage or leaks, appropriate corrective actions are taken to restore filters operation.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-11 and EU-13</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"Maintain records on a monthly basis of each delivery related to hydrated lime, including the tons of hydrated lime delivered and VMT for each delivery, and determine the 12-month rolling total for each", Permit Condition II.B.17.c.i.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Record of hydrated lime delivery (in tons) and the VMT for each delivery, plus record 12-month rolling total for each is maintained at the site.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-11**

Permit Term (Describe requirements and cross-reference): **"Maintain records of the dates and results of each filter inspection performed pursuant to Condition II.B.17.b.ii, and record any corrective actions taken as a result of the required inspections", Permit Condition II.B.17.c.ii.**

Compliance Methods for the Above (Description and Citation): **Record of fabric filter inspection and corrective actions taken is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Annually, and at such other times as specified by EPA, shall conduct performance tests for NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub>, CO, hydrocarbon, HCl, and mercury emissions from the boilers and furnish EPA a written report of the results of such tests", Permit Condition II.C.1.**

Compliance Methods for the Above (Description and Citation): **Annual performance tests for NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub>, CO, hydrocarbon, HCl, and mercury emissions from the boilers was conducted in CY 2021. Performance test report was submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The annual performance tests for NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub> and CO shall be conducted at the maximum operating capacity", Permit Condition II.C.1.**

Compliance Methods for the Above (Description and Citation): **The annual performance tests for NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub> and CO was conducted at the maximum operating capacity in CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Annual performance tests for PM, HCl, and mercury must be completed no more than 13 months after the previous test, except as specified in 40 CFR 63.7515(b), (c) and (g)", Permit Condition II.C.1.**

Compliance Methods for the Above (Description and Citation): **In CY 2021, annual performance tests for PM, HCl, and mercury was completed within 13 months of the previous performance test.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests results for the emissions of NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub>, CO, hydrocarbons, HCl, and mercury shall be reported in accordance with Condition II.E.6 of the permit", Permit Condition II.C.2.**

Compliance Methods for the Above (Description and Citation): **CY 2021 performance tests results for the emissions of NO<sub>x</sub>, SO<sub>2</sub>, PM, PM<sub>10</sub>, CO, hydrocarbons, HCl, and mercury were submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of SO<sub>2</sub> shall be conducted using EPA Test Methods 1-4 and 8", Permit Condition II.C.2.a.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the SO<sub>2</sub> emissions were conducted using EPA Test Method 6.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of PM shall be conducted using EPA Test Methods 1-4 (for general source test requirements; Method 5 or 17 (positive pressure fabric filters must use Method 5D), and Method 19 (for F-factor methodology)", Permit Condition II.C.2.b.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of PM were conducted using EPA Test Method 5.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of PM<sub>10</sub> shall be conducted using EPA Test Methods 1-4 and Method 5 and 201A", Permit Condition II.C.2.c.**

Compliance Methods for the Above (Description and Citation): **PM conducted during stack tests.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of CO shall be conducted using EPA Test Methods 1-4 and 10", Permit Condition II.C.2.d.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of CO were conducted using EPA Test Method 10.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of NO<sub>x</sub> shall be conducted using EPA Test Methods 1-4 and 7", Permit Condition II.C.2.e.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of NO<sub>x</sub> were conducted using EPA Test Method 7E.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of HCl shall be conducted using EPA Test Methods 1-4 (for general source test requirements); Method 26 or 26A (to measure HCl concentration); and Method 19 (for F-factor methodology)", Permit Condition II.C.2.f.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of HCl were conducted using EPA Method 321.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Performance tests for the emissions of Mercury shall be conducted using EPA Test Methods 1-4 (for general source test requirements); Methods 29, 30A, 30B, Method 101A, or ASTM Method D6784 (to measure mercury concentration); and Method 19 (for F-factor methodology)", Permit Condition II.C.2.g.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of mercury were conducted using EPA Method 30B and Method 19 F-factor using ASTM D6323 and ASTM E711.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Notify EPA (Attn: Air Section, ENF-2-1) in writing at least 60 days prior to the tests described in Condition II.C.2 of the permit to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test", Permit Condition II.C.3.**

Compliance Methods for the Above (Description and Citation): **EPA was notified at least 60 days prior to the CY 2021 performance test.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For performance test purposes, sampling ports, platforms and access shall be provided on the boiler exhaust systems in accordance with 40 CFR 60.8(e)", Permit Condition II.C.4.**

Compliance Methods for the Above (Description and Citation): **Boilers are provided with sampling ports, platforms and access to carry out performance test.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Conduct periodic fuel sampling to ensure compliance of fuel with permit conditions. This condition may be satisfied by the fuel monitoring specified by this permit", Permit Condition II.C.5.**

Compliance Methods for the Above (Description and Citation): **Fuel sampling records are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each time while burning combined fuels, retest emissions of toxic pollutants as the fuel composition may cause health risks to exceed the acceptable thresholds and submit retest results to the Cabazon Band, EPA and SCAQMD", Permit Condition II.C.6.**

Compliance Methods for the Above (Description and Citation): **CEMS monitoring is continuous.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-03**

Permit Term (Describe requirements and cross-reference): **"In order to comply with the minimum annual feedstock requirement of this permit, submit to the Cabazon Band and Riverside County accurate records on a calendar quarter basis", Permit Condition II.C.7.**

Compliance Methods for the Above (Description and Citation): **Fuel feedstock records were submitted to the Cabazon Band and Riverside County for each quarter of CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"In order to comply with the minimum annual average tonnage requirement in Condition II.B.7 of this permit, submit to Riverside County and the Cabazon Band accurate records on a calendar quarter basis", Permit Condition II.C.8.**

Compliance Methods for the Above (Description and Citation): **Fuel records were submitted to the Cabazon Band and Riverside County for each quarter of CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When the biomass fuel supply in the Coachella Valley is unavailable, does not meet the Permittee's quality requirements, or is priced non-competitively with respect to other available biomass sources (as documented by Permitte and verified by Riverside County), the Permittee may satisfy the bone-dry tonnage requirement by utilizing biomass tonnage documented by it to have been generated within other areas of Riverside County", Permit Condition II.C.8.**

Compliance Methods for the Above (Description and Citation): **Record of biomass fuel suppliers is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Install, maintain and operate continuous monitoring systems to measure stack gas SO<sub>2</sub>, CO and NO<sub>x</sub> concentrations as well as oxygen levels", Permit Condition II.C.9.a.**

Compliance Methods for the Above (Description and Citation): **Boilers 1 and 2 are equipped with continuous monitoring systems to measure stack gas SO<sub>2</sub>, CO and NO<sub>x</sub> concentrations and oxygen levels.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Continuous monitoring system shall meet EPA monitoring performance specifications and the requirements at 40 CFR 63.7525 (a)(1)-(6) for the continuous monitoring of CO and oxygen", Permit Condition II.C.9.a.**

Compliance Methods for the Above (Description and Citation): **CEMS meet EPA monitoring performance specifications and the requirements at 40 CFR 63.7525 (a)(1)-(6) for the continuous monitoring of CO and oxygen.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"In the alternative to Condition II.C.9.a, the Permittee may develop an operating limit for oxygen and install, maintain and operate a continuous oxygen analyzer and develop a site-specific monitoring plan pursuant to the provisions at 40 CFR 63.7575 and 63.7505(d)(1)-(6)", Permit Condition II.C.9.a.i.**

Compliance Methods for the Above (Description and Citation): **CEMS has continuous O<sub>2</sub> monitoring.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"A continuous monitoring system to measure stack gas volumetric flow rates and shall meet EPA performance specifications (40 CFR 52, Appendix E)", Permit Condition II.C.9.b.**

Compliance Methods for the Above (Description and Citation): **CEMS measures stack gas volumetric flow rates and meets EPA performance specifications (40 CFR 52, Appendix E).**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Install continuous opacity monitoring system that continuously measures the stack gas opacity and shall meet EPA monitoring performance specifications (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specification 1)", Permit Condition II.C.9.c.**

Compliance Methods for the Above (Description and Citation): **Boilers are equipped with continuous opacity monitoring system (COMS) that continuously measures the stack gas opacity and meet EPA monitoring performance specifications (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specification 1).**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall conduct performance tests annually to determine compliance with the percent of sulfur dioxide emission rate (%Ps) and the sulfur dioxide emission rate (Es) found in Condition II.A.3 of this permit using the procedures listed below", Permit Condition II.C.10.**

- **If only petroleum coke is combusted, the procedures found in 40 CFR 60.45b(c)(2) shall be used.**
- **If petroleum coke is combusted with other fuels, the procedures found in 40 CFR 60.45b(c)(3) and 60.45b(c)(4) shall be used.**

Compliance Methods for the Above (Description and Citation): **In CY 2021, petroleum coke was not used and combusted at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Compliance with the SO<sub>2</sub> emission limits and percent reduction requirements under Condition II.A.2 of this permit shall be based on the average emission rates and the average percent reduction for SO<sub>2</sub> for 30 successive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day after the initial performance test, and a new 30-day average emission rate and percent reduction for SO<sub>2</sub> are calculated to show compliance with the standard", Permit Condition II.C.11.**

Compliance Methods for the Above (Description and Citation): **In CY 2021, petroleum coke was not used and combusted at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Except when burning only natural gas, use all valid SO<sub>2</sub> emissions data in calculating % Ps and E<sub>ho</sub> under 40 CFR 60.45b(c) whether or not the minimum emissions data requirements under 40 CFR 60.46b are achieved. All valid emissions data, including valid SO<sub>2</sub> emission data collected during periods of startup, shutdown and malfunction, shall be used in calculating % Ps and E<sub>ho</sub> pursuant to Condition II.C.10 of this permit", Permit Condition II.C.12.**

Compliance Methods for the Above (Description and Citation): **In CY 2021, petroleum coke was not used and combusted at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"During periods of malfunction or maintenance of the SO<sub>2</sub> control systems when natural gas is combusted as provided under 40 CFR 60.42b(i), emissions data must be used to determine compliance with the SO<sub>2</sub> emission limit in Condition II.A.3 of this permit", Permit Condition II.C.13.**

Compliance Methods for the Above (Description and Citation): **No periods of SO<sub>2</sub> malfunction.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Compliance with the particulate matter emission standards in Condition II.A.5 of this permit shall be determined through annual performance testing using the test methods and procedures described in 40 CFR 60.46b(d)", Permit Condition II.C.14.**

Compliance Methods for the Above (Description and Citation): **Performance tests for the emissions of PM were conducted using EPA Test Method 5.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"In order to demonstrate compliance with the SO<sub>2</sub> emission standard of Condition II.A.2 of this permit, obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement is not met with a single monitoring system, supplement the emission data with data collected with other monitoring systems as approved by the Administrator", Permit Condition II.C.15**

Compliance Methods for the Above (Description and Citation): **In CY 2021, petroleum coke was not used and burned at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"To calculate the average SO<sub>2</sub> emission rates in Condition II.A.2 of this permit, each 1-hour average SO<sub>2</sub> emission rate must be based on more than 30 minutes of steam generating unit operation and include at least 2 data points with each representing a 15-minute period. Hourly SO<sub>2</sub> emission rates are not calculated if the facility is operated less than 30 minutes in a 1-hour period and are not counted toward determination of a steam generating unit operating day", Permit Condition II.C.16.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>In CY 2021, petroleum coke was not used and burned at the site.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the SO<sub>2</sub> CEMS", Permit Condition II.C.17.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>The procedures under 40 CFR 60.13 are followed for operation of SO<sub>2</sub> CEMS.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 (40 CFR 60 - Appendix B)", Permit Condition II.C.17.a.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>All CEMS are operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 of 40 CFR 60 - Appendix B.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance <input checked="" type="checkbox"/> Continuous Compliance</p>

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 (40 CFR 60 - Appendix F)", Permit Condition II.C.17.b.**

Compliance Methods for the Above (Description and Citation): **CEMS quarterly accuracy determinations and daily calibration drift tests were performed in accordance with Procedure 1 of 40 CFR 60 - Appendix F.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When the facility combusts coke, alone or in combination with other fuels, the span value of the SO<sub>2</sub> CEMS at the inlet to the SO<sub>2</sub> control device is 125 percent of the maximum estimated hourly potential SO<sub>2</sub> emissions of the fuel combusted, and the span value of the CEMS at the outlet to the SO<sub>2</sub> control device is 50 percent of the maximum estimated hourly potential SO<sub>2</sub> emissions of the fuel combusted", Permit Condition II.C.17.c**

Compliance Methods for the Above (Description and Citation): **In CY 2021, petroleum coke was not used and burned at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The nitrogen dioxide and opacity continuous monitoring systems required under 40 CFR 60.48b(b) shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments", Permit Condition II.C.18.**

Compliance Methods for the Above (Description and Citation): **NO<sub>x</sub> and opacity emissions data are continuously monitored, recorded, and records are maintained at the site, including periods of calibration checks, and zero and span adjustments.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The 1-hour average nitrogen oxides emission rates measured by the continuous nitrogen oxides monitor required by 40 CFR 60.48b(b) and 40 CFR 60.13(h) shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least 2 data points must be used to calculate each 1-hour average", Permit Condition II.C.19.**

Compliance Methods for the Above (Description and Citation): **NO<sub>x</sub> emission rates measured by CEMS are expressed in lb/million Btu heat input. CEMS provides continuous monitoring of NOX emissions updating every 10 seconds and providing one hour averages.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the nitrogen dioxide and opacity continuous monitoring systems", Permit Condition II.C.20.**

Compliance Methods for the Above (Description and Citation): **The procedures under 40 CFR 60.13 are followed for operation of NO<sub>x</sub> CEMS and opacity continuous monitoring systems.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When combusting petroleum coke or wood, the span value for a continuous monitoring system for measuring opacity shall be between 60 and 80 percent", Permit Condition II.C.20.a.**

Compliance Methods for the Above (Description and Citation): **Span values delineated in QA QC plan.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When combusting petroleum coke or natural gas, the span value for nitrogen oxides shall be determined as provided in 40 CFR 60.49b(e)(2)", Permit Condition II.C.20.b.**

Compliance Methods for the Above (Description and Citation): **Span values delineated in QA QC plan.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"All span values computed under Permit Condition II.C.20.b for combusting mixtures of regulated fuels must be rounded to the nearest 500 ppm", Permit Condition II.C.20.c.**

Compliance Methods for the Above (Description and Citation): **Span value delineated in QA QC plan.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days", Permit Condition II.C.21.**

Compliance Methods for the Above (Description and Citation): **CEMS Downtime is recorded and reported quarterly.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Develop a site-specific monitoring plan and obtain monitoring data according to 40 CFR 63.7535 for each continuous monitoring systems that is not operated pursuant to 40 CFR part 60 appendix B requirements and used to demonstrate compliance with any applicable Subpart DDDDD emission limit through performance testing and subsequent compliance with operating limits", Permit Condition II.C.22.**

Compliance Methods for the Above (Description and Citation): **Site-specific monitoring plan for continuous emission monitoring systems (CEMS) is maintained at the site. Annual performance test results are maintained at the facility showing compliance with Subpart DDDDD emission limit and operating limits.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Demonstrate continuous compliance with applicable Subpart DDDDD Table 8 requirements", Permit Condition II.C.23.**

Compliance Methods for the Above (Description and Citation): **Site is in compliance with applicable Subpart DDDDD Table 8 requirements. Continuous emission monitoring systems data and annual performance test results are maintained at the site showing compliance with Subpart DDDDD requirements.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"To comply with the requirements of 40 CFR 64.7 and to maintain continuous compliance with the PM<sub>10</sub> emission limit in II.A.4 and the opacity limit in II.A.7 of this permit, maintain and operate a continuous opacity monitoring system that continuously measures the stack gas opacity in Boilers 1 and 2", Permit Condition II.C.24.**

Compliance Methods for the Above (Description and Citation): **Boilers are equipped with CMOS that continuously measures the stack gas opacity.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"An excursion of the PM<sub>10</sub> emission limit shall be defined as an opacity reading that exceeds the average hourly opacity reading of 7.5%. An excursion of the PM<sub>10</sub> and/or opacity limits shall be defined as an hourly average that exceeds 7.5%. The monitoring system shall be calibrated to alarm when an excursion occurs", Permit Condition II.C.24.**

Compliance Methods for the Above (Description and Citation): **COMS is calibrated to provide alarm when an opacity reading exceeds the average hourly opacity reading of 7.5%.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When the monitoring system gives alarm over PM<sub>10</sub> and/or opacity limits excursion as defined in Permit Condition II.C.24, immediately investigate into the cause of the alarm", Permit Condition II.C.24.a.**

Compliance Methods for the Above (Description and Citation): **When COMS gives alarm over PM<sub>10</sub> and/or opacity limits excursion, causes of the alarm are investigated immediately. Investigation records are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"If at any time during the corrective action steps in Condition II.C.24 of the permit, the stack gas opacity exceeds the 10% limit in Condition II.A.7 of the permit, immediately shut down the boiler(s) and associated fabric filter(s) and report any permit deviation pursuant to Condition III.C of the permit", Permit Condition II.C.24.b.**

Compliance Methods for the Above (Description and Citation): **Applicable deviation reports with regards to opacity emissions limits have been submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When the monitoring system gives alarm over PM<sub>10</sub> and/or opacity limits excursion as defined in Permit Condition II.C.24, perform maintenance or replacement of the fabric filter component(s). Return units to normal operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions", Permit Conditions II.C.24.c and II.C.24.d.**

Compliance Methods for the Above (Description and Citation): **Maintenance record of the fabric filter components is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"When the monitoring system gives alarm over PM<sub>10</sub> and/or opacity limits excursion as defined in Permit Condition II.C.24, complete reporting and recordkeeping pursuant to section II.D and II.E of this permit and appropriate facility wide reporting in accordance with section III.C.1 of this permit", Permit Condition II.C.24.e.**

Compliance Methods for the Above (Description and Citation): **Opacity limits deviation records are maintained at the site. Applicable deviation reports have been submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-11**

Permit Term (Describe requirements and cross-reference): **"At least once per calendar month, inspect the interior and exterior of the fabric filters for evidence of damage or leaks and take appropriate corrective actions to restore filters to proper operation before resuming normal operations", Permit Condition II.C.25.**

Compliance Methods for the Above (Description and Citation): **Fabric filters inspection record is maintained at the site. Fabric filters are maintained as needed.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Record and maintain daily records of the amounts and types of biomass fuel fired each calendar quarter, the amount of natural gas fired each calendar quarter, the amount of petroleum coke fired each calendar quarter, the amount of railroad ties fired each calendar quarter, the amount of TDF fired each calendar quarter, the amount of corrugated paper waste fired each calendar quarter, and the plant hours of operation. All information shall be recorded in a permanent form suitable for inspection and the file shall be retained for at least five years. Permit Condition II.D.1.**

Compliance Methods for the Above (Description and Citation): **Record of amount and types of fuel fired each calendar quarter is maintained at the site. In CY 2021, petroleum coke was not fired at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. Retain the recordkeeping file for at least two years following the date of such measurements, maintenance, reports and records", Permit Condition II.D.2.**

Compliance Methods for the Above (Description and Citation): **Record of continuous monitoring systems evaluations, calibration checks, and maintenance performed is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For boilers, maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for petroleum coke, natural gas, and wood for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month", Permit Condition II.D.3.**

Compliance Methods for the Above (Description and Citation): **Record of the amount of each fuel combusted and annual capacity factor for each fuel is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain records of opacity", Permit Condition II.D.4.**

Compliance Methods for the Above (Description and Citation): **Opacity record is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): "Maintain following records for each steam generating unit", **Permit Condition II.D.5.**

- **Calendar date.**
- **The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub> in units of ng/J or lb/million Btu heat input) measured or predicted.**
- **The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.**
- **Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under Condition II.A.12 of this permit, with the reasons for such excess emissions as well as a description of corrective actions taken.**
- **Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.**
- **Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.**
- **Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.**
- **Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.**
- **Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with NSPS 40 CFR 60 - Performance Specification 2 or 3.**
- **Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR 60 - Appendix F, Procedure 1.**

Compliance Methods for the Above (Description and Citation): **Records are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): "Maintain all records required by 40 CFR 60 - Subpart Db for a period of 2 years following the date of such record", **Permit Condition II.D.6.**

Compliance Methods for the Above (Description and Citation): **Records of 40 CFR 60 - Subpart Db are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-09**

Permit Term (Describe requirements and cross-reference): "**Maintain records of the hours of operation and diesel fuel use for the emergency generator**", **Permit Condition II.D.7.**

Compliance Methods for the Above (Description and Citation): **Record of the emergency generator operating hours is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): "**Maintain monthly records of the weight and height of the ash storage pile, dates of ash transfer from the silo to the storage area, and dates of ash transfer offsite**", **Permit Condition II.D.8.**

Compliance Methods for the Above (Description and Citation): **Record of weight and height of the ash storage pile, dates of ash transfer to the storage area, and dates of ash transfer offsite is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain a log of continuous opacity monitoring data and submit the most recent six months of data to EPA in the semi-annual monitoring reports required by condition III.C.1 of this permit", Permit Condition II.D.9.**

Compliance Methods for the Above (Description and Citation): **Log of continuous opacity monitoring data is maintained at the site. Opacity monitoring data was submitted to EPA with the semi-annual monitoring reports.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-11**

Permit Term (Describe requirements and cross-reference): **"Maintain records of the dates and results of each filter inspection performed pursuant to Condition II.C.25 of this permit and any corrective actions taken as a result of the required inspections shall be recorded", Permit Condition II.D.10.**

Compliance Methods for the Above (Description and Citation): **Record of filter inspections and corrective actions taken is maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain records for the boilers according to 40 CFR 63.7555(a)(1) and (2), (b), (c), and (d) and according to Table 8 of 40 CFR Part 63, Subpart DDDDD", Permit Condition II.D.11.**

Compliance Methods for the Above (Description and Citation): **Records for the boilers according to 40 CFR 63.7555(a)(1) and (2), (b), (c), and (d) and according to Table 8 of 40 CFR Part 63, Subpart DDDDD are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit a quarterly composition analysis of petroleum coke supply to the Cabazon Band, EPA and SCAQMD", Permit Condition II.E.1.**

Compliance Methods for the Above (Description and Citation): **Petroleum coke was not used and burned at the site in CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit a written report of all excess emissions to EPA (Attn: Air Section, ENF-2-1) for every calendar quarter", Permit Condition II.E.2.**

Compliance Methods for the Above (Description and Citation): **Excess emissions report were submitted to EPA for every calendar quarter of CY 2021.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit semiannual reports of information recorded as required by Condition II.D.5 of this permit", Permit Condition II.E.4.**

Compliance Methods for the Above (Description and Citation): **Was submitted 2nd half of 2021 and forward.**

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"Submit semiannual reports of all information related to compliance with the SO<sub>2</sub> emission limit and percent reduction requirement of Condition II.A.3 of this permit. Semiannual report shall include information as per Condition II.D.6 of this permit, Permit Condition II.E.5.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Submitted under MACT. Was submitted 2nd half of 2021 and forward.</b></p> <p>Status (Check one): <input checked="" type="checkbox"/> Intermittent Compliance    <input type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"All semiannual reports required under 40 CFR 60 - Subpart Db is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period, Permit Condition II.E.7.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>See above.</b></p> <p>Status (Check one): <input checked="" type="checkbox"/> Intermittent Compliance    <input type="checkbox"/> Continuous Compliance</p>
<p>Emission Unit ID(s): <b>EU-01</b></p> <p>Permit Term (Describe requirements and cross-reference): <b>"The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section II of the permit", Permit Condition II.E.9.</b></p> <p>Compliance Methods for the Above (Description and Citation): <b>Will notify if applicable.</b></p> <p>Status (Check one): <input type="checkbox"/> Intermittent Compliance    <input checked="" type="checkbox"/> Continuous Compliance</p>

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"The Regional Administrator shall be notified in writing within fifteen (15) days of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section II of the permit", Permit Condition II.E.9.**

This notification shall include,

- Description of the malfunctioning equipment or abnormal operation
- the date of the initial failure
- the period of time over which emissions were increased due to the failure
- the cause of the failure
- the estimated resultant emissions in excess of those allowed under Section II of this permit
- the methods utilized to restore normal operations.

Compliance Methods for the Above (Description and Citation): **Will notify if applicable.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit semiannual compliance reports required pursuant to 40 CFR part 63, Subpart DDDDD, Table 9 and according to the procedures in 40 CFR 63.7550(h)(1) through (3)", Permit Condition II.E.10.**

Compliance Methods for the Above (Description and Citation): **Semiannual compliance reports required pursuant to 40 CFR part 63, Subpart DDDDD, Table 9 and according to the procedures in 40 CFR 63.7550(h)(1) through (3) were submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit the applicable notifications to the EPA in 40 CFR 63.7(b) and (c); 40 CFR 63.8(e), (f)(4), and (6); 40 CFR 63.9(b) through (h); and 40 CFR 63.7545(g) and (h)", Permit Condition II.E.11.**

Compliance Methods for the Above (Description and Citation): **Will notify if applicable.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s):

Permit Term (Describe requirements and cross-reference): **"Comply with the requirements of "Monitoring and Enforcement Agreement" as listed in Attachment A and Attachment B of this permit", Permit Condition II.F.**

Compliance Methods for the Above (Description and Citation): **See Monitoring and Enforcement Agreement.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Comply with the fee payment and offset credit requirements, Permit Condition II.F.2.a through II.F.2.c.**

Compliance Methods for the Above (Description and Citation): **Fee payment completion and offset credit records are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain fuel receipts, bills of lading or transportation manifests, and scale records for acquisition and transportation of fuel acquired from within the Coachella Valley which would otherwise be burned in the open field. Record-keeping shall include daily records of weight, type, and geographic location of origin of fuel received for combustion at the facility and the number of operating days in the previous 365-day period", Permit Condition II.F.4.**

Compliance Methods for the Above (Description and Citation): **Records of fuel usage are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each year, on the anniversary of the date of initial combustion of biomass fuel at the facility, submit the records maintained in accordance with condition II.F.4 of this permit to EPA (Attn: Air Section, ENF-2-1) and to the SCAQMD office in Diamond Bar, California", Permit Condition II.F.5.**

Compliance Methods for the Above (Description and Citation): **Records of fuel usage were submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"All the records as listed in condition II.F.4 of this permit shall be maintained in a permanent form suitable for inspection, and the file shall be retained for at least two years following the date of such measurements, calculation, and record", Permit Condition II.F.6.**

Compliance Methods for the Above (Description and Citation): **Fuel usage records are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"After the end of the ten year period commencing with the initial startup of the facility on biomass fuel ("the ten year period"), facility shall continue to fully offset plant emissions", Permit Condition II.F.7.a through II.F.7.c.**

Compliance Methods for the Above (Description and Citation): **Records maintained at site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative", Permit Condition II.G.2.**

Compliance Methods for the Above (Description and Citation): **Records of occurrence and duration of any startup, shutdown, or malfunction of an affected facility are maintained at the site.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **“Submit excess emissions and monitoring systems performance report and-or summary report form to the Administrator semi-annually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period”, Permit Condition II.G.3.**

Compliance Methods for the Above (Description and Citation): **Excess emissions and monitoring systems performance report were submitted to the Administrator for each quarter of CY 2021. Excess emissions and monitoring systems performance report are maintained at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **“Excess emissions and monitoring systems performance summary report form shall contain the information and be in the format shown in Figure 1 in 40 CFR 60.7(d), unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility”, Permit Condition II.G.4.**

Compliance Methods for the Above (Description and Citation): **Excess emissions and monitoring systems performance report were prepared as per the format shown in Figure 1 in 40 CFR 60.7(d). Summary report form was submitted for each pollutant monitored at the site. Excess emissions and monitoring systems performance report are maintained at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records", Permit Condition II.G.5 and II.G.5.a through II.G.5.c.**

Compliance Methods for the Above (Description and Citation): **All records with regards to continuous monitoring system, monitoring device, and performance testing measurements, monitoring device calibration checks, and maintenance performed on these systems are maintained at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Compliance with standards in 40 CFR 60 - Subpart Db, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR 60.8, unless otherwise specified in Section II.C of this permit", Permit Condition II.G.7.**

Compliance Methods for the Above (Description and Citation): **Annual performance test was conducted at the site for compliance with 40 CFR 60 - Subpart Db standards. Performance test results are available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Compliance with opacity standards in 40 CFR 60 - Subpart Db shall be determined by conducting observations in accordance with Reference Method 9 in 40 CFR 60 - Appendix A, any alternative method that is approved by the Administrator, or as provided in paragraph 40 CFR 60.11(e)(5). For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard)", Permit Condition II.G.8.**

Compliance Methods for the Above (Description and Citation): **Boilers are equipped with continuous opacity monitoring system (COMS) recording opacity emissions data continuously.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"At all times, including periods of startup, shutdown, and malfunction, to the extent practicable, maintain and operate this facility including associated air pollution control equipment as efficiently as possible in a manner consistent with good air pollution control practice for minimizing emissions", Permit Condition II.G.10**

Compliance Methods for the Above (Description and Citation): **Boilers and associated pollution control devices were operated with good air pollution control practice for minimizing emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere", Permit Condition II.G.12.**

Compliance Methods for the Above (Description and Citation): **No equipment was installed at the site that could conceal facility's emissions.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests under 40 CFR 60.8. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device", Permit Condition II.G.14.**

Compliance Methods for the Above (Description and Citation): **Continuous monitoring systems and monitoring devices were operational prior to conducting annual performance test. Records with regards to Continuous monitoring systems and monitoring devices are available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Conduct COMS or CEMS performance evaluations consistent with 40 CFR 60 - Appendix B, at such other times as may be required by the Administrator under section 114 of the Act", Permit Condition II.G.15.**

Compliance Methods for the Above (Description and Citation): **Quarterly and annual RATAs completed.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Check the zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in 40 CFR 60 - Appendix B", Permit Condition II.G.16.**

Compliance Methods for the Above (Description and Citation): **Recorded with daily CEMS calibrations.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For continuous monitoring systems measuring opacity of emissions, the optical surfaces exposed to the effluent gases shall be cleaned prior to performing the zero and span drift adjustments except that for systems using automatic zero adjustments. The optical surfaces shall be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity", Permit Condition II.G.16.**

Compliance Methods for the Above (Description and Citation): **Completed with Quarterly audits.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For continuous monitoring systems measuring opacity of emissions, minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photodetector assembly", Permit Condition II.G.17.**

Compliance Methods for the Above (Description and Citation): **Completed with Quarterly audits.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as listed in condition II.G.18.a through II.G.18.b of this permit", Permit Condition II.G.18.**

Compliance Methods for the Above (Description and Citation): **Continuous monitoring systems is maintained in continuous operation and meet minimum frequency of operation requirements as listed in condition II.G.18.a through II.G.18.b of this permit. Records with regards to continuous monitoring systems are available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained", Permit Condition II.G.19.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of emissions updating every ten seconds and providing one hour averages and three hour averages.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Continuous monitoring systems for measurement of opacity, reduce all data to 6-minute averages and six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period", Permit Condition II.G.20.**

Compliance Methods for the Above (Description and Citation): **COMS provides continuous monitoring of opacity emissions. Opacity averages are calculated from 36 or more data points equally spaced over each 6-minute period.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Continuous monitoring systems for measurement of pollutants other than opacity, reduce all data to 1-hour averages and 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period", Permit Condition II.G.20.**

Compliance Methods for the Above (Description and Citation): **CEMS provides continuous monitoring of emissions updating every ten seconds and providing one hour and three hour averages emission data.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"With respect to compliance with all New Source Performance Standards of 40 CFR Part 60, comply with the "General notification and reporting requirements" found in 40 CFR 60.19", Permit Condition II.G.23.**

Compliance Methods for the Above (Description and Citation): **Will report if applicable.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit to EPA a source test plan 30 days prior to any required testing. The source test plan shall include and address the elements as listed in this condition of the permit", Permit Condition III.A.1.**

Compliance Methods for the Above (Description and Citation): **Source test plan was submitted to EPA at least 60 days prior to performance testing. Test plan is available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **“Unless otherwise specified by an applicable requirement or permit condition in Section II of this permit, all source tests shall be performed at maximum operating rates (90% to 110%) of device design capacity”, Permit Condition III.A.2.**

Compliance Methods for the Above (Description and Citation): **Source test was performed at maximum operating rates (90% to 110%) of device design capacity. Emissions performance test report is available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **“Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test. No adjustments are to be made within two (2) hours of the start of the tests”, Permit Condition III.A.3.**

Compliance Methods for the Above (Description and Citation): **Only regular operating staff adjusted the processes or emission control device parameters during annual performance test.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"During each test run and for two (2) hours prior to the test and two (2) hours after the completion of the test, record the following information", Permit Condition III.A.4**

- **Fuel characteristics**
- **Visible emissions**
- **All parametric data which is required to be monitored in Section II of the permit**
- **Other source specific data identified in Section II of the permit**

Compliance Methods for the Above (Description and Citation): **Annual performance test report is available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Each source test shall consist of at least three (3) valid test runs and the emission results shall be reported as the arithmetic average of all valid test runs and in the terms of the emission limit", Permit Condition III.A.5**

Compliance Methods for the Above (Description and Citation): **Annual performance test report is available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Source test reports shall be submitted to EPA within 60 days of completion of the test", Permit Condition III.A.6.**

Compliance Methods for the Above (Description and Citation): **Performance test report was submitted to EPA within 60 days of completion of the test.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Keep records of the following monitoring information", Permit Condition III.B.1**

- **The date, place, and time of sampling or measurements;**
- **The date(s) analyses were performed;**
- **The company or entity that performed the analyses;**
- **The analytical techniques or methods used;**
- **The results of such analyses; and**
- **The operating conditions as existing at the time of sampling or measurement.**

Compliance Methods for the Above (Description and Citation): **Monitoring information records are available at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit", Permit Condition III.B.2.**

Compliance Methods for the Above (Description and Citation): **Monitoring information records are retained at the site and available for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Submit to EPA Region 9 reports of any monitoring required under 40 CFR 71.6(a)(3)(i)(A), (B), or (C) for each six month reporting period from January 1 to June 30 and from July 1 to December 31, except that the first reporting period shall cover the period from August 3, 2006 through December 31, 2006. All reports shall be submitted to EPA and shall be postmarked by the 30th day following the end of the reporting period. A monitoring report shall include elements as listed in conditions III.C.1.a(1)-(9) of this permit. All instances of deviations from permit requirements must be clearly identified and reports must be certified by a responsible official", Permit Condition III.C.1.**

Compliance Methods for the Above (Description and Citation): **Six month monitoring reports were submitted to EPA for CY 2021. Monitoring reports were submitted by the end of the 30<sup>th</sup> day following the end of reporting period.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Promptly report to the EPA Regional Office deviations from permit or start-up, shut-down malfunction plan requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken", Permit Condition III.C.2.**

Compliance Methods for the Above (Description and Citation): **Deviations from permit conditions and emission limits, including corrective actions taken were reported to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For emissions of a hazardous air pollutant or a toxic air pollutant that continue for more than an hour in excess of permit requirements, the deviation report must be made within 24 hours of the occurrence. Deviation shall be reported by telephone, facsimile, or electronic mail sent to AEO\_R9@epa.gov", Permit Condition III.C.2.b(1) and III.C.3.**

Compliance Methods for the Above (Description and Citation): **Deviations from permit conditions and emission limits were reported to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For emissions of any regulated pollutant excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the deviation report must be made within 48 hours. Deviation shall be reported by telephone, facsimile, or electronic mail sent to AEO\_R9@epa.gov", Permit Condition III.C.2.b(2) and III.C.3.**

Compliance Methods for the Above (Description and Citation): **Applicable deviations were reported within 48 hours. These deviations were also reported under six months semiannual monitoring report.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **For all other deviations from permit requirements, excluding emissions of a hazardous air pollutant or a toxic air pollutant or any regulated pollutant, the deviation report shall be submitted with the semi-annual monitoring report required in paragraph III.C.1 of this permit", Permit Condition III.C.2.b(3).**

Compliance Methods for the Above (Description and Citation): **Applicable deviations were submitted with the semi-annual monitoring report.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"For deviations listed under conditions III.C.2.b of this permit, a written notice, certified consistent with paragraph III.C.4 of this permit must be submitted within 10 working days of the occurrence. All deviations reported under conditions III.C.2.b of this permit must also be identified in the 6-month report required under paragraph III.C.1 of this permit", Permit Condition III.C.3.**

Compliance Methods for the Above (Description and Citation): **Applicable deviations were submitted within 10 working days of the occurrence and also identified under 6-month monitoring report.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **EU-01**

Permit Term (Describe requirements and cross-reference): **"Any application form, report, or compliance certification required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete", Permit Condition III.C.4.**

Compliance Methods for the Above (Description and Citation): **All compliance certifications were submitted under certification by a responsible official.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Construct and operate the facility in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and local air quality regulations", Permit Condition III.D.**

Compliance Methods for the Above (Description and Citation): **Site is in compliance with applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State and local air quality regulations.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Identify hazards which may result from accidental releases using appropriate hazard assessment techniques. Design, maintain, and operate a safe facility. Minimize the consequences of accidental releases if they occur", Permit Condition III.F.1.**

Compliance Methods for the Above (Description and Citation): **Appropriate hazard assessment techniques are implemented at the site. Site is operated and maintained in such a manner as to prevent accidental releases.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Certify annual compliance with all requirements of 40 CFR part 68, including compliance with the risk management plan submitted to EPA", Permit Condition III.F.2.**

Compliance Methods for the Above (Description and Citation): **Site is in compliance with the risk management plan submitted to EPA.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Pay annual fees and submit actual emission reports in accordance with the procedures described in conditions IV.A.1.a through IV.A.1.f of this permit. Pay the annual permit fee and submit the fee filing form by September 22 of each year", Permit Condition IV.A.1.**

Compliance Methods for the Above (Description and Citation): **Annual permit fee and the fee filing form has been submitted by September 22 of each year.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment", Permit Condition IV.A.2.**

Compliance Methods for the Above (Description and Citation): **Fee calculation worksheets and other emissions-related data to determine fee payment are maintained at the site for review.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance



**B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application", Permit Condition IV.B.1.**

Compliance Methods for the Above (Description and Citation): **Site is in compliance with all conditions of this Part 71 permit.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Submit to EPA Region 9 a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 30 of each year and covering the previous calendar year. The certification shall include the elements listed in conditions IV.C.2.a through IV.C.2.d of this permit", Permit Condition IV.C.1.**

Compliance Methods for the Above (Description and Citation): **A certification of compliance with permit terms and conditions has been submitted to EPA Region 9 for the previous years.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): **N/A**

Permit Term (Describe requirements and cross-reference): **"Furnish to EPA, within a reasonable time, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit", Permit Condition IV.D.**

Compliance Methods for the Above (Description and Citation): **Information requested by EPA has been furnished to EPA within stipulated timeframe previously.**

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

**C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS**

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception to compliance." Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also, specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: **None**

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_ End: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_:\_\_\_\_

Date Written Report Submitted \_\_\_\_/\_\_\_\_/\_\_\_\_